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International Validation Branch (AIR-731)
Compliance & Airworthiness Division
Federal Aviation Administration

Hamburg, March 11th 2022

**Subject: Installation of a cabin VIP interior on Airbus A318
Petition for Exemption against 25.813(e) for the private use configuration**

**Reference: FAA Project SA09790NY-T; EASA STC 10052652 REV. 3 & EASA project
60079043**

Dear Madams, Sirs.

Lufthansa Technik AG (LHT) in Hamburg, has been contracted to validate an EASA STC initially issued to BizJet (FAA STC ST11186SC initial revision and validated EASA STC 10052652 initial revision) for the installation of a VIP Cabin in an A318-112 (MSN05545). The aircraft was certified for private use. After BizJet decided to quit from the market the STC was transferred to LHT as STC holder with revision 1 of the FAA and EASA STC. LHT amended the operational possibilities with revision 2 of the EASA STC to allow private or commercial use. Revision 3 of EASA STC 10052652 included administrative corrections in the STC but no further design changes.

Based upon the specific design of the VIP aircraft, deviations/exemptions from specific requirements of the Federal Aviation Regulations (FAR) and the European Aviation Safety Agency's Certification Specifications (JAR) were required. These deviations/exemptions have been listed in the associated sections of the STCs.

During the validation activities for EASA STC rev. 3 at FAA, it was realized, that for the initially approved private cabin configuration no pendant to EASA CRI D-5301-010 for "internal doors" has been issued by FAA. Therefore LHT has been requested to send a petition for exemption against 25.813(e) for the private use configuration.

For further details of the requested exemption please refer to enclosure.
Please do not hesitate to contact LHT in case of any questions.

Sincerely,

Heike Iwaniczik (HEIKE IWANICZIK)

PP Bernhard Gamroth
Project Manager Certification
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Enclosure

Angaben zur Gesellschaft finden Sie auf der Rückseite.
For corporate details please turn over.



Petition for Exemption from FAR25.813(e)
Enclosure to letter dated March 10th 2022

FAA-Project No.: SA09790NY-T

Revision History

Rev.	Revision Highlight
IR	Initial Issue

Petitioner

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Affected section of 14 CFR

FAR 25.813(e)

“No door may be installed in any partition between passenger compartments”

Requested Relief on 14 CFR Part 25 Requirement 25.813(e)

Lufthansa Technik requests relief from the “no doors between passenger compartment” requirements of Federal Aviation Regulation (FAR) Part 25 Requirement 25.813(e) for the door located between the Executive Lounge and Private Office on an Airbus Model A318-112 aircraft (MSN05545).

The aircraft can be operated for commercial and non-commercial (private) use. This exemption is applicable for the non-commercial (private) use operation, only. In case of non-commercial use, the door is set inoperative in open and locked position by execution of a maintenance action prior to flight. The maintenance action includes the installation of a door lock plate, which assures, that the locks are hidden and cannot be used, when plate is installed.

Relief on the requirement for doors between passenger compartments is requested due to existence of separated rooms in the VIP cabin layout.

A comparable relief is granted by EASA during the validation process per Certification Review Item.

Background

Lufthansa Technik AG (LHT) in Hamburg, has been contracted to validate revision 3 of EASA STC 10052652. Application has been made by EASA sending a forwarding letter and documentation package according Bilateral Agreement.

The Federal Aviation Administration (FAA) has accepted application for a STC-validation of a European Aviation Safety Agency (EASA) STC and has filed the project under control number WTS# 21-DOC-20954

The initial STC process was handled by BizJet and a VIP cabin for an Airbus A318-112 was approved by FAA STC ST11186SC. This STC was validated at EASA using the Bilateral Agreement. This STC was transferred to Lufthansa Technik as STC holder when BizJet ended its business and the STC was revised (Rev. 1 of FAA and EASA STC) to name the new STC holder. Based on STC Revision 1 LHT developed a design change to convert the aircraft from private to commercial use (and vice versa). For this design change the former (STC Rev. 1) certification basis was reused and adopted with some additional requirements on EASA PCM request to establish the certification basis for EASA STC revision 2. Special Conditions, which were part of the initial Certification Basis had not been changed. Due to formal corrections in EASA STC a Revision 3 became necessary. This revision 3 is subject to the actual validation activities.

During this activities FAA found, that during the initial approval for the non-commercial (private) cabin configuration, a Certification Review Item (CRI D-5301-010 Issue 1, "Installation of Interior Doors") was issued by EASA, with no equivalent at FAA. The necessity for a petition for exemption to requirement 25.813(e) was named in the FAA validation working plan.

Basis for Exemption

The aircraft that is the subject of this petition is a Airbus Model A318-112 modified for non-commercial operation in this configuration. The interior VIP cabin configuration installed results in a very small passenger population compared to for-hire or common-carriage standards. These passenger are typically very experienced travelers. For this reason, the crew and the passenger who fly this aircraft have substantially higher familiarity with the aircraft and its systems than those envisioned by the writers of the original regulations.

The exemption proposed herein are justified based upon the following facts:

- This aircraft is intended for VIP use and is, in the configuration with the active door installed in front of a private office, not intended for commercial use.
- This aircraft carries a much lower amount of passengers compared to the originally type-approved passenger load.
- The requested exemption is in accordance to the requirements of EASA CRI D-5301-010 Issue 1.
- Similar exemptions have been routinely granted for VIP transport category aircraft for many years. For example: Exemptions 6820/6820A, 6881, 7609 as well as others have been either fully or partially granted by FAA.

- The Petitioner proposes mitigating requirements and conditions that establish acceptable levels of safety for the occupants consistent with previous grants.

With these justifications in mind, LHT requests relief from and proposes a petition for exemption from 14CFR 25.813(e).

14 CFR 25.813(e) at Amendment 25-128: Doors Between Passenger Compartments

This discussion covers doors that separate passenger compartments from other areas throughout the aircraft. This discussion does not include doors that separate e.g. lavatories or bathrooms from passenger compartments and these doors do not apply to this exemption request.

There is only one interior door that separates two passenger compartments. This interior door is installed in front of the private office.

The door between passenger compartments has the following design features:

- the door is operated manually
- the door which needs to be latched in the open position for taxi, take off and landing is equipped with dual latches (each of which is able to withstand the forces defined § 25.561(b)) to secure the door in the open position and to prevent inadvertent closing
- the door is frangible to allow egress in the event that it should become stuck
- the door provides vent areas to allow free airflow in the event of a rapid decompression
- the door provides features to unlock the door from either side without the use of a special tool
- cockpit indication of the door position for taxi, take-off and landing

Safety Considerations

The risk for occupants due to the use of doors between passenger compartments should be considered acceptable due to the features mentioned above and for the following reasons:

- the airplane, in the configuration with the active door installed in front of a private office, will be operated for non-commercial carriage only.
- an Airplane Flight Manual Supplement (AFM-S) provides procedures and limitations to ensure that the door is in the proper position for taxi, take-off and landing

Public Interest

Granting this exemption was in the public interest at time of initial STC for the following reasons:

- Given the proliferation of VIP configured Transport Category Airplanes, and anticipated in the near future, approval of these exemptions will enable the United States manufacturers of Transport Category Airplanes to effectively compete in this expanding market.
- Additional sales of components manufactured in the United States even for VIP interiors installed outside the United States will serve to increase supplying/supporting company's profitability.
- Stability and improved financial performance of these United States companies gives greater job stability to the workers employed by the companies, causing a stabilizing influence to the greater United States economy, due to the consumer spending activities associated with stable workers.
- Improved financial performance of United States owned and operated corporations, and increased workforce stability translates into continued and improved local, state, and federal tax revenues which in turn add to the stability of the total United States economy.
- Improved financial performance allows United States corporations to continue to invest in Research and Development, allowing the United States to maintain or improve its competitive position in the world economy.
- Foreign operators of US-manufactured aircraft strengthens the preeminent global position of the United States aircraft manufacturing.
- This aircraft, in the configuration with the active door installed in front of a private office, will be operated under 14 CFR parts 91 and 125 or its foreign equivalent. This aircraft will not be operated for hire or offered for common carriage inside the US and therefore there is no safety impact on the US flying public.
- An alignment between EASA and FAA in terms of special conditions represents a step towards harmonizing the requirements of FAA and EASA.

Future use and application of the exemption

LHT intends to use this Exemption for the validation of the STC revision of this one single A318-112 aircraft, only. Use and applicability of the Exemption will be controlled in the validation project.